

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109

**COMMENTS OF THE NATIONAL ASSOCIATION OF
TELECOMMUNICATIONS OFFICERS AND ADVISORS**

I. INTRODUCTION

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”), released March 4, 2011, in the above-entitled proceedings.

NATOA’s membership includes local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of such services for the nation’s local governments.

II. NATOA’S INTEREST

NATOA and its members have long-advocated for increased broadband deployment and adoption, especially in unserved and underserved areas of our country. The economic, educational, health, and social benefits that broadband can bring to local communities cannot be overstated. For its part, NATOA has worked to support broadband availability through cable franchising agreements, tower facility siting policies, and public safety communications infrastructure installations. But more needs to be done to ensure that affordable broadband deployment occurs in those areas where broadband service is lacking or lagging behind.

Widespread, high capacity broadband has the power to transform our economy and our everyday lives. We commend the Commission in adopting this NPRM that seeks to 1) modernize the Lifeline and Link Up programs; 2) take steps to protect against waste, fraud, and abuse; and 3) “support pilot projects that would assist the Commission in assessing strategies to increase broadband adoption.”¹

II. DISCUSSION

Eligibility for Bundled Voice/Broadband Services

It is imperative that Lifeline and Link Up enter the 21st century and that eligible households be permitted to use Lifeline benefits for bundled voice and broadband services. As the Commission points out, “voice service alone may no longer be adequate to meet the basic communications needs of low-income Americans.”² Unfortunately, this group is also the most likely to be unable to afford a home broadband connection. For this reason, NATOA strongly encourages the Commission to adopt a uniform federal requirement that Lifeline and Link Up

¹ See *In the Matter of Lifeline and Link Up Reform and Modernization, Federal-State Joint Board on Universal Service, and Lifeline and Link Up (“NPRM”)*, WC Docket No. 11-42, CC Docket No. 96-45 and WC Docket No. 03-109, ¶ 1 (released March 4, 2011).

² *Id.* at ¶ 10.

discounts may be used on any Lifeline calling plan that includes a bundled service package combining voice and broadband. While it may be but a small step in increasing broadband adoption rates in low-income populations, it is still a step worth taking.

However, some low-income consumers may not want, for whatever reason, to subscribe to bundled services. Recognizing that providing consumers with options may be one way to promote increased broadband adoption, we urge the Commission to take steps to permit Lifeline and Link Up benefits to be used for broadband services only. Doing so may permit some Lifeline consumers to take advantage of low-cost broadband services, such as that announced by Comcast for \$9.95 a month as part of its merger with NBCU, for little or no out-of-pocket expense.

Protection Against Waste, Fraud, and Abuse

NATOA is very supportive of increased efforts to combat waste, fraud, and abuse in the Lifeline and Link Up programs. It is especially disheartening to learn that multiple providers seek reimbursement for Lifeline services to the same residence. But while a one-per-residential address rule may make eligibility compliance easier to administer, we urge the Commission to address the issue of group living facilities and other similar housing situations to ensure that otherwise eligible consumers are not denied the benefits of the programs.

But until these efforts are sufficient to provide real cost savings that can be used to provide Lifeline and Link Up benefits to all eligible recipients, we urge the Commission not to impose a funding cap. Indeed, with the proposed expansion of the programs to include broadband service, imposing an artificial cap now without a full understanding of its impact on broadband adoption may serve only to increase the digital divide now facing low-income Americans.

Pilot Projects

We are supportive of the Commission's suggestion that it set aside a funding source to support a pilot broadband program to evaluate whether the Lifeline and Link Up programs can support broadband adoption by low-income households. However, we hope the Commission expands participation in the program beyond broadband providers and those with experience in program design and evaluation. Indeed, it is vital that the Commission involve others in the project, such as private foundations, non-profit institutions, equipment manufacturers, digital literacy training professionals, and so on. Furthermore, we encourage the Commission to look at various means of increasing broadband adoption rates by low-income Americans and not necessarily focus on a single adoption model.

III. CONCLUSION

The Commission should move forward and take steps to reform the Lifeline and Link Up programs by 1) modernizing the programs by permitting the use of Lifeline and Link Up benefits for broadband service; 2) immediately instituting steps to alleviate waste, fraud, and abuse to avoid the imposition of a funding cap; and 3) funding a pilot program to determine ways to increase broadband adoption by low-income Americans.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Traylor".

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